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September 25, 2017

FILED ELECTRONICALLY

The Honorable Jocelyn G. Boyd
Chief Clerk

South Carolina Public Service Commission

Post Office Drawer 11649
Columbia, South Carolina 29211

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RE: Application of Southern Light, LLC for a Certificate of Public Convenience and Necessity to Provide Resold and Facilities-Based Local Exchange and Interexchange Telecommunications Services in the State of South Carolina, and for Alternative and Flexible Regulation and for Authority to Merge Tower Cloud, Incorporated with and into Southern Light, LLC, with Southern Light, LLC Surviving
Docket No. 2017-294-C

Dear Jocelyn:

This letter supplements the above-referenced Application. As background, "Uniti Fiber" is a consortium of commonly-owned operating companies holding various certificates of public convenience and necessity across multiple jurisdictions, all recently acquired by Uniti Group Inc. Uniti Fiber's goal is to integrate the business operations, networks, and customer bases of these various companies into a more unified organization rather than under separate individual operating companies. As part of that effort, Uniti Fiber been undertaking various analyses to determine how to transfer assets and other operations between these companies in order to streamline the number of licensed operating companies across a wide geographic area (including most of the Gulf Coast, East Coast, Northeast and Midwest U.S.). These analyses include considerations including tax implications, customer service requirements, regulatory implications, and other issues.

After conducting this analysis in the Spring of 2017, Unity Fiber decided initially to merge Tower Cloud, Inc. into Uniti Fiber LLC as part of this reorganization effort. As a result, an application was submitted to this Commission seeking approval for new operating authority for Uniti Fiber LLC, and for the approval to merge Tower Cloud, Inc. into Uniti Fiber LLC. That application was dated April 24, 2017, was assigned Docket No. 2017-147-C, and was approved on August 25, 2017.

On July 3, 2017, Uniti Group Inc. acquired Southern Light, LLC (the Applicant in this Docket) and Hunt Telecommunications, and these two companies became part of the Uniti Fiber umbrella of companies. Through these two acquisitions, Uniti Fiber's operations were significantly enhanced in scope. Neither of these companies currently holds a certificate in South Carolina, (and Hunt Communications is not seeking any authority in this Docket).

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Subsequent to the approval of the Uniti Fiber LLC application (in Docket No. 2017-147-C), Uniti Fiber undertook a new review of how it would consolidate the various Uniti Fiber operating companies, which now further included consideration of Southern Light, LLC and Hunt Telecommunications. Through that analysis, Uniti Fiber's regulatory, tax, and business consultants determined that the most efficient and effective course of action was to merge Tower Cloud, Inc. into Southern Light, LLC, rather than into Uniti Fiber, LLC.

As such, the current application (Docket No. 2017-294-C) seeks approval for Southern Light, LLC to obtain authority to provide telecommunications services in South Carolina, and to merge Tower Cloud, Inc. into Southern Light, LLC. Consequently, Tower Cloud will not merge into Uniti Fiber LLC, but for the time being Uniti Fiber LLC nonetheless intends to maintain the certificate granted by this Commission in Docket No. 2017-147-C.

The Applicant hopes that this explains why the above-referenced application requests approvals very similar to those sought in Docket No. 2017-147-C, and how circumstances have changed for Unity Fiber and its companies.

Please let me know if you have any questions or need further information.

Sincerely,

s/ John J. Pringle, Jr.
John J. Pringle, Jr.

JJP/cr

cc: Jeffrey Strenkowski (via electronic mail service)
Office of Regulatory Staff (via electronic mail service)